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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE

MOTORS LIQUIDATION Company, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

**APPELLEE OFFICIAL COMMITTEE OF UNSECURED CREDITORS¹
DESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

The Official Committee of Unsecured Creditors (“Appellee”), through its undersigned counsel and pursuant to Federal Rule of Bankruptcy Procedure 8009(a), hereby designates the following items to be included in the record on appeal:

Item	Date	Docket & Case Nos.	Description
1	12/30/2011	ECF No. 33 (Adv. Pro. No. 11-09406) ²	Designation of Contents (appellant). U.S. Department of the Treasury’s Designation of Contents of Record on Appeal and Statement of Issues on Appeal
2	5/9/2012	ECF No. 11 (S.D.N.Y. Case.	ENDORSED LETTER addressed to

¹ The Official Committee of Unsecured Creditors consulted with the other appellees in preparing this counter-designation.

² We believed that Appellant intended to designate this docket number as No. 29 in Appellant’s Designation of Items to be Included in the Record on Appeal.

		No. 12-695)	Judge Colleen McMahon from Michael J. Edelman dated 5/8/2012 re: EDC respectfully requests an opportunity to submit a brief addressing this new interpretation that was first raised de novo by the Court at Friday's oral argument. ENDORSEMENT: I would prefer that you wait until I propound a list of questions I have arising out of oral argument and respond to them in in fulsome writing.
3	6/5/2012	ECF No. 13 (S.D.N.Y. Case No. 12-695)	Appellant's Reply Brief filed by Export Development Canada
4	8/11/2016	ECF No. 13729 (Bankr. Case No. 09-50026)	Letter providing record citations pertinent to one issue referenced during August 10 oral argument filed by David S. Jones on behalf of United States of America
5	8/11/2016	ECF No. 61 (Adv. Pro. No. 11-09406)	Copy of Order of U.S. District Court Judge Colleen McMahon signed on 7/3/12 and modified on 8/11/16 to correct signature date.

RESERVATION OF RIGHTS

Appellee reserves the right to withdraw, supplement, amend, or modify its designations and to move to strike any items included by the Appellant in its Designation of Items for the Record on Appeal.

Dated: September 27, 2016
New York, New York

KRAMER LEVIN NAFTALIS & FRANKEL LLP

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